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APPL. OF THE CITY OF SAN ANTONIO §  
TO AMEND ITS [CCN] FOR THE §  
SCENIC LOOP 138-KV TRANS. LINE IN §  
BEXAR COUNTY, TX §

STATE OFFICE OF PUBLIC UTILITY SUPERVISION  
ADMINISTRATIVE HEARINGS  
FILING CLERK

**RESPONSE TO THE BRAD JAUER AND BVJ PROPERTIES, L.L.C.**  
**FIRST RFI TO SAVE HUNTRESS LANE AREA ASSOCIATION**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this response to the First Request for Information (“RFI”) from Brad Jauer and BVJ Properties, L.L.C. (“Jauer”), which was received on March 12, 2021, therefore this response is timely. Attached hereto and incorporated herein by reference are the written responses thereto. To the extent that any of the RFI instructions or definitions seek or purport to impose obligations or conditions or to expand the scope of permissible discovery beyond that which is established by the Commission’s procedural rules or any orders entered in this docket, the responses will comply with what is required under those rules or orders. Such responses are also made without waiver of the right to contest the admissibility of any such matters upon hearing. It is hereby stipulated that the responses may be treated by all parties as if they were filed under oath.

Respectfully submitted,

By: /s/ Thomas K Anson  
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**ATTORNEYS FOR SHLAA**

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on Mar. 22, 2021.

/s/ Thomas K Anson  
Thomas K. Anson

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JAUER-1-1 On page 2, the witnesses state that "Within the SHLAA, members have direct access... [to] the area..." Admit or deny that members do not have road access into and through Tract ID F-021.

Response: Denied. Per CPS Energy's original Application Attachment 8, Directly Affected Landowner List, Tract F-021 is affected by Segments 26, 37, 38, 39, and 43, and is owned by Southerland Canyons III. Southerland Canyons III is a member of the Canyons Property Owners Association ("Canyons POA"), and thus included within the membership of SHLAA. Per CPS Energy's original Application landowner map Sheet 11, Tract F-021 there is a road that enters into Tract F-021. There are other dirt roads which are located in Tract F-021, such as the dirt road along Segment 39, that are accessible and have been utilized by SHLAA members.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes and David Clark

JAUER-1-2 How many homes have been constructed on Tract ID F-021.

Response: None.

Prepared By: Counsel  
Sponsoring Witness: David Clark

JAUER-1-3 How many homes have had construction completed in The Canyons of Scenic Loop north of Kendall Canyon (the road) after it passes the southwest corner of Tract ID F-107 (traveling northwest) up to the southern boundary of Tract ID F-021?

Response: There are six houses in various stages of construction.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes and David Clark

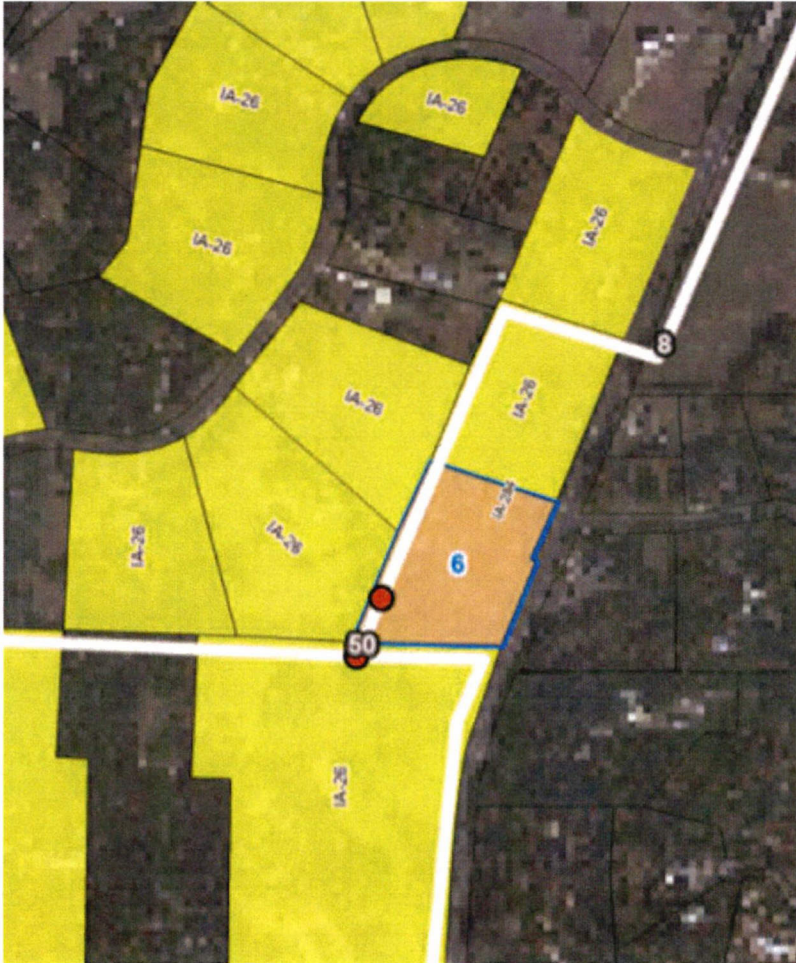
JAUER-1-4 How many of the 31 individual landowner members of SHLAA are impacted by "Routes F1, K, L, N1, O, P, Q1, R1, S, T1, U1, V, W, BB, and CC" as referenced in the Grimes, Clark, and Rumpf testimony in the middle of page 5? Please list the individual landowner members by name and the routes that directly impact each of them individually?

Response: All. Please see the SHLAA motion to intervene for names, available at [http://interchange.puc.texas.gov/Documents/51023\\_26\\_1080019.PDF](http://interchange.puc.texas.gov/Documents/51023_26_1080019.PDF).

Prepared By: Counsel  
Sponsoring Witness: David Clark

JAUER-1-5 How many of the 31 individual landowner members of SHLAA own property within 300 feet of proposed Substation Site 6?

Response: It appears that there are four, per CPS Energy's Feb. 11, 2021 Intervenor Map Inset 2:



Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-6 How many of the 31 individual landowner members of SHLAA own property within 300 feet of proposed Substation Site 7?

Response: It appears that there is one, per CPS Energy's Feb. 11, 2021 Intervenor Map Inset 2:



Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes



JAUER-1-7. How many of the 31 individual landowner members of SHLAA have habitable structures that are within 300 feet of a segment proposed by CPS Energy? Please list the landowner members by name and specify their Tract IDs, the type of each habitable structure involved (e.g., house), and the segment that is within 300 feet of each of their habitable structures(s)?

Response:

Please see CPS Energy's Attachment 8, Landowner Notice List, to its original application (which is available at

<https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>). This provides the name, tract identification numbers, type of habitable structure, and line segment for the individual members who are identified by name and address in the SHLAA motion to intervene (available at [http://interchange.puc.texas.gov/Documents/51023\\_26\\_1080019.PDF](http://interchange.puc.texas.gov/Documents/51023_26_1080019.PDF)).

In addition, as to the four additional habitable structures identified in Attachment E to the direct testimony of Cynthia Grimes, David Clark, and Jerry Rumpf:

There is a guest house along Segment 26a to the southwest of Habitable Structure 150.

There is a work building along Segment 15 to the southeast of Habitable Structure 146.

There is a work building along Segment 15 to the east of Habitable Structure 146.

There is a horse stable business building along Segment 15 to the east of Habitable Structure 142.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-8 Are the 5 additional water wells (referenced on page 7) that are identified as being “within 200 feet of a line segment that CPS Energy did not previously identify” permitted or registered? If so, please provide copies of each permit and registration. In addition, please provide the driller's logs for each of these wells and any other document that you have related to the well(s). Finally, please specify how each of these wells is currently being used.

Response: Water well drillers are the ones responsible for water well permitting and registration, including drilling logs. That information is publicly available on the relevant regulatory agency website(s). See for example <https://tceq.maps.arcgis.com/apps/webappviewer/index.html?id=aed10178f0434f2781daff19eb326fe2>. Because there is no municipal water supply system to the individual SHLAA members, all of the 5 additional water wells are currently in use for water supply to the property owners.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-9 Is Sally Cody, who is said to be an individual landowner member of SHLAA, aware that her property abuts substation 7?

Response: Yes.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-10 Admit or deny that Sally Cody has not intervened in this matter in her individual capacity.

Response: Denied. Sally Cody is a member of SHLAA and a property owner abutting proposed Substation Site 7, who intervened as an individual member of SHLAA. See the SHLAA motion to intervene, available at [http://interchange.puc.texas.gov/Documents/51023\\_26\\_1080019.PDF](http://interchange.puc.texas.gov/Documents/51023_26_1080019.PDF).

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-11 Please identify the names and Tract IDs of all the members of the "leadership group for SHLAA" referenced in Grimes, Clark, and Rumpf testimony on Pages 1-2.

Response: Because the question refers to "Tract IDs," it is assumed that the question is asking for information regarding CPS Energy's Attachment 8, Landowner Notice List, to its original application, which provides the name and tract identification numbers for those to whom CPS Energy provided landowner notice under the Commission's rules. (The notice requirement is not the same as who might be affected by proposed transmission line segments and possible routes, since the notice requirement is limited to those with property that would be crossed by the transmission line right-of-way or would have a habitable structure within 300 feet of the line).

That CPS Energy notice list is available at

<https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>.

Below is a list of the names of the leadership group for SHLAA and, to the extent they were provided notice by CPS Energy, their Tract ID numbers from the CPS Energy's Landowner Notice List:

Dick Breakie, 10320 Huntress Lane –Tract IDs F-136 & 141  
Debbie Castillo, 9660 Huntress Lane –Tract ID F-047  
Rob & Cynthia Grimes, 10326 Huntress Lane –Tract ID F-139  
Tommy & Linda Triesch, 10343 Huntress Lane –Tract ID K-006  
Byron Swartzendruber, 10235 Huntress Lane –Tract ID P-001  
Bill Hill, 10335 Huntress Lane –Tract ID P-007  
Jerry Rumpf (Altair POA)  
Jason J. Thompson (Canyons POA)  
David Clark (Canyons POA)

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-12 On page 8 of his testimony, Harold Hughes states that he “met with affected SHLAA landowners and discussed specific impacts to their properties”. Please produce the specific names and addresses of the SHLAA landowners with whom Mr. Hughes met and impacts that he found (both generally and relative to each landowner's property, specifically).

Response: Mr. Hughes generally visited the entire CPS Energy study area, including the publicly accessible areas where all the proposed routes would parallel or from which they would be potentially visible, and all of the proposed substation sites. He was on the private property of the SHLAA members with whom he briefly met as he visited the SHLAA area.

Those included all of the members of the leadership group for SHLAA identified in response to JAUER 1-11. It also included Randy Davila, located at 10330 Huntress Lane.

The impacts he found generally and relative to a landowner's property are described in his direct testimony, as well as in the direct testimony of Cynthia Grimes, David Clark, and Jerry Rumpf of which he was aware and which he did not repeat in his testimony.

Prepared By: Counsel  
Sponsoring Witness: Harold L. Hughes, Jr., P.E.

JAUER-1-13 Admit or deny that Cynthia Grimes has not intervened in this matter in her individual capacity.

Response: Denied. Cynthia Grimes is a member of SHLAA and a property owner along Segment 26a, who intervened as an individual member of SHLAA. See the SHLAA motion to intervene, available at [http://interchange.puc.texas.gov/Documents/51023\\_26\\_1080019.PDF](http://interchange.puc.texas.gov/Documents/51023_26_1080019.PDF).

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

JAUER-1-14 Admit or deny that there is an agricultural tax exemption on Tract ID F-021. Please provide any and all documents relating to an agricultural tax exemption on Tract ID F-021.

Response: Admitted. The Canyons POA, which includes Tract ID F-021, does not monitor property tax exemptions for the properties of those within the Canyons POA. Information that is publicly available should be on the Bexar County appraisal district's website. See <https://bcad.org/>.

Prepared By: Counsel  
Sponsoring Witness: David Clark.